

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

HAAS OUTDOORS, INC.

Plaintiff,

V.

DRYSHOD INTERNATIONAL, LLC,
AND JAMES K. DONOHUE

Defendants.

C.A. NO. 1:18-cv-00978-RP
[LEAD CASE]

**DRYSHOD INTERNATIONAL, LLC,
AND JAMES K. DONOHUE**

Plaintiffs,

V.

HAAS OUTDOORS, INC.,

Defendant.

C.A. NO. 1:18-cv-00596-RP
[CONSOLIDATED]

PLAINTIFF'S NOTICE TO THE COURT

EXHIBIT D

Plaintiff's Deposition Witness Designations

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

HAAS OUTDOORS, INC. §
§
Plaintiff, § C.A. NO. 1:18-cv-00978-RP
§ [LEAD CASE]
v. §

DRYSHOD INTERNATIONAL, LLC, §
AND JAMES K. DONOHUE §
§
§
Defendants.

DRYSHOD INTERNATIONAL, LLC, §
AND JAMES K. DONOHUE § C.A. NO. 1:18-cv-00596-RP

v. *soo*

HAAS OUTDOORS, INC., §
§
§
Defendant §

PLAINTIFF'S DEPOSITION WITNESS DESIGNATIONS

Pursuant to Local Rule CV-16(f)(6) and the Court’s June 30, 2021 Order (Dkt. #257), Plaintiff Haas Outdoors, Inc. (“Haas Outdoors”) states that all of the depositions that it otherwise might use are from will-call witnesses. The parties have agreed, with the Court’s permission, to a procedure for the calling of witnesses and designating of deposition testimony in the unlikely event that a witness not appear in person (Dkt. #261).

Dated: September 30, 2021.

Respectfully submitted,

HAAS OUTDOORS, INC.

By Its Attorneys,
JONES WALKER LLP

By: s/ W. Whitaker Rayner
W. WHITAKER RAYNER

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